

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
NATIONAL ASSOCIATION OF PRESORT MAILERS WITNESS MACHARG  
(USPS/NAPM-T1-3-9)

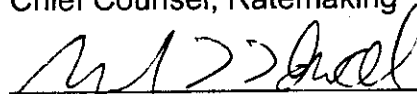
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to NAPM witness Macharg: USPS/NAPM-T1-3-9.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
January 28, 1998

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE  
TO NAPM WITNESS MACHARG**

USPS/NAPM-T1-3

Did your company comply with the move update requirements as of July 1, 1997? Did all other presort bureaus comply as of July 1, 1997? Are there currently presort bureaus who have expressed an intention to use the Fast Forward option for compliance, but which are not now in compliance? Please indicate the number of presort bureaus you know to fit this description.

USPS/NAPM-T1-4

Please confirm that before the move update requirements were mandatory, there was significant voluntary use of ACE, ACS and NCOA by First-Class presort mailers?

USPS/NAPM-T1-5

What is the basis for your claim that volumes processed through Fast Forward will "be free of most all forwarding costs to the USPS" as you indicate at page 2, lines 21 to 23?

USPS/NAPM-T1-6

- (a) What percentage of presort bureaus currently use the Fast Forward option to comply with the move update requirement?
- (b) On what percentage of their MLOCRs do these presort bureaus currently use the Fast Forward option to comply with the move update requirement?

USPS/NAPM-T1-7

What percentage of presort bureaus intend to use the Fast Forward option to comply with the move update requirement?

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE  
TO NAPM WITNESS MACHARG**

**USPS/NAPM-T1-8**

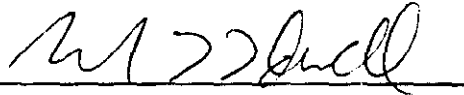
- (a) Of commercial mailers which use MLOCRs to prepare their own presort First-Class Mail, what percentage currently use the Fast Forward option to comply with the move update requirement?
- (b) Of commercial mailers which use MLOCRs to prepare their own presort First-Class Mail, on what percentage of their MLOCRs do these mailers currently use the Fast Forward option to comply with the move update requirement?

**USPS/NAPM-T1-9**

What percentage of commercial mailers which use MLOCRs to prepare their own presort First-Class Mail intend to use the Fast Forward option to comply with the move update requirement?

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Michael T. Tidwell

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